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**To:** [Chip\\_Humphrey/R10/USEPA/US@EPA](#); [jworonets@anchorenv.com](#); [Jim.McKenna@portofportland.com](#); [RICKA@BES.CI.PORTLAND.OR.US](#)  
**Cc:** [ANDERSON.Jim@deq.state.or.us](#); [Eric.Blischke/R10/USEPA/US@EPA](#); [erin.madden@gmail.com](#); [Gina.Grepo-Grove/R10/USEPA/US@EPA](#); [Greg.Gervais@noaa.gov](#); [jpeers@stratusconsulting.com](#); [kpine@anchorenv.com](#); [Kristine.Koch/R10/USEPA/US@EPA](#); [MCCLINCY.Matt@deq.state.or.us](#); [michael.karnosh@grandronde.org](#); [mtritt@integral-corp.com](#); [Robert.Neely@noaa.gov](#); [rose@yakama.com](#); [sheila@ridolfi.com](#); [wolffg@plu.edu](#)  
**Subject:** Re: Reducing level of validation for SBLT mobility tests | for EPA  
**Date:** 02/12/2009 11:44 AM

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Hi Chip,

Thanks very much.

Bob

----- Original Message -----

**From:** [Humphrey.Chip@epamail.epa.gov](#) <[Humphrey.Chip@epamail.epa.gov](#)>  
**To:** Jennifer Woronets <[jworonets@anchorenv.com](#)>; McKenna, Jim <[Jim.McKenna@portofportland.com](#)>; Rick Applegate <[RICKA@BES.CI.PORTLAND.OR.US](#)>; Wyatt, Robert  
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**Sent:** Thu Feb 12 11:41:07 2009  
**Subject:** Reducing level of validation for SBLT mobility tests | for EPA

Bob, Jim and Rick

This is in response to the LWG's request (email from Maja Tritt, below) to reduce the data validation level for the 44 SBLT mobility tests. As discussed at yesterday's project manager meeting, the LWG's request is acceptable with the condition that the LWG conduct a full (Level IV) data validation on at least 2 data packages for SBLT prior to reducing the data validation level for these tests.

Please let us know if you have any questions regarding this approval.

Chip Humphrey  
EPA Oregon Operations Office  
(503) 326-2678

"Jennifer  
Woronets"  
<[jworonets@anchorenv.com](#)>

To  
Chip\_Humphrey/R10/USEPA/US@EPA,  
Eric.Blischke/R10/USEPA/US@EPA

01/28/2009 04:05  
PM

cc

Gina

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<mtritt@integral-corp.com>

Subject

FW: Reducing level of validation  
for SBLT mobility tests | for EPA

Chip, Eric,

Please see below and attached from Maja Tritt.

Thank you,  
Jen Woronets J  
Anchor Environmental, LLC  
6650 SW Redwood Lane, Suite 333  
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503-670-1108 Phone Ext 24  
503-670-1128 Fax  
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From: Maja Tritt [<mailto:mtritt@integral-corp.com>]  
Sent: Wednesday, January 28, 2009 12:54 PM  
To: Jennifer Woronets  
Cc: Keith Pine  
Subject: Reducing level of validation for SBLT mobility tests | for EPA

Jen, please forward the following and attached to Chip Humphrey and Eric Blischke with a cc to Ginna Grepo-Grove. Thanks.

Chip and Eric,

The LWG would like to reduce the level of validation for a portion of the mobility test data packages relative to the validation procedures described in the Round 2 QAPP and QAPP Addendum 11. Per Ginna's request when I discussed this matter with her on January 13, attached please find: 1) A summary of data validation items included in level III and level IV validation as described in the QAPP, and items included in the proposed level II validation (i.e., modified electronic screening); 2) A description of level II data validation procedures; and 3) A summary of qualifiers applied to mobility test samples during validation according to QAPP specifications. These attachments were provided by EcoChem.

The sample set and current validation status is as follows:

| Sample type   | Number of samples | Validation status |
|---------------|-------------------|-------------------|
| Bulk sediment | 11                | complete          |
| TCLP sediment | 11                | complete          |
| Site water    | 22                | complete          |

|               |    |              |
|---------------|----|--------------|
| MET extracts  | 22 | 14% complete |
| SBLT extracts | 44 | not started  |
| -----         |    |              |
| TCLP extracts | 11 | complete     |

To date, all of the data for sediment, site water, and TCLP extract samples have been validated according to QAPP procedures, including all data for sediment and surface water collected from the site and analyzed without further processing. Data validation for MET extracts is in progress, also at validation levels III and IV per the QAPP. A summary of qualifiers applied to the sediment, surface water, and TCLP extracts is provided in attached table Qual Summary.xls, with reasons for qualification. This table shows that the majority of QC outliers that resulted in data qualification would also have been identified by level II validation. One can reasonably expect that a similar proportion of qualifiers will be identified during level II validation for the SBLT extract data as for the surface water and SBLT extract samples.

LWG proposes to reduce the data validation level for the 44 SBLT extracts. These samples are batched in small batches because only a few samples a week can be filtered given the large volumes of water required for analysis and the slow filtration times. Because of the short holding times for the extracts, these samples can't be batched efficiently. As a result, the cost of validation for the mobility test samples has increased substantially, from approximately \$80,000 to over \$180,000. The cost for level II validation is expected to be approximately \$110,000. The SBLT data will be used to evaluate confined disposal and capping options in the FS, and will not be used for the baseline risk assessment. Given these data uses and the nature of the QC outliers for the surface water and TCLP extract data, the proposed level II validation is expected to be sufficient for the SBLT samples.

Please let us know whether these changes are acceptable to you. Please contact Keith Pine or me with any questions. Thank you very much.

Maja

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(See attached file: DV Level XREF.pdf)(See attached file: Mobility Level II Electronic Approach.pdf)(See attached file: Qual summary.pdf)